

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.,)	
et al.)	
Plaintiffs,)	
)	
v.)	C.A. No. 04-1337-KAJ
)	
AUDIOVOX COMMUNICATIONS CORP.,)	
et al.)	
Defendants.)	
)	

HONEYWELL INTERNATIONAL INC.,)	
et al.)	
Plaintiffs,)	
)	
v)	C.A. No. 04-1338-KAJ
)	
APPLE COMPUTER, INC., et al.)	
)	
Defendants.)	

DECLARATION OF GERALD ANGELI

1. I am V.P. World Wide Engineering & Technology of Concord Camera Corp. ("Concord"), and I submit this Declaration on behalf of Concord in support of the pure customer defendants' motion to stay the above-entitled actions.

2. I have been continuously employed by Concord since April 2000 and have held a variety of positions directly involved with Concord's digital still camera business. By virtue of these positions and in my current role as V.P. World Wide Engineering & Technology, I am familiar with Concord's electronic product design and manufacturing

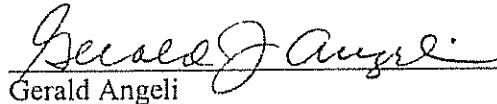
activities, including, but not limited to, those relating to Concord's digital still camera products.

3. Concord, through one or more of its subsidiaries, manufactures and/or sells digital still cameras, including digital cameras which contain an LCD screen.

4. Concord does not, nor did it ever, design, manufacture or assemble any of the LCD screens which are attached to any Concord product, including digital still cameras. Rather, Concord purchases all of the LCD screens from outside suppliers and manufacturers.

5. Pursuant to Section 1746 of Title 28 of the United States Code, I declare the foregoing to be true and correct under the penalties of perjury of the United States of America.

Dated: Hollywood, Florida
May 3, 2005


Gerald Angeli

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2005, I hand delivered the foregoing document to the following persons and electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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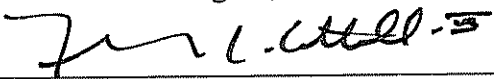
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